:

Initial Study/Proposed Negative Declaration

Kinder Morgan Groundwater Treatment Discharge System Imperial, California

Colorado River Basin
Regional Water Quality Control Board

May 2011

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ACRONYMS AND ABBREVIATIONS

°F	degree Fahrenheit
ATC	Authority to Construct
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
COC	contaminants of concern
EIR	Environmental Impact Report
ft/ft	feet per foot
GHG	Greenhouse Gas
gpm	gallons per minute
GWTS	Groundwater Treatment and Product Recovery System
KMEP	Kinder Morgan Energy Partners
IS	Initial Study
LGAC	liquid-phase granular activated carbon
LPH	liquid-phase hydrocarbon
MND	Mitigated Negative Declaration
OWS	oil/water separator
PBT	Product Barrier Trench
PM10	particulate matter less than 10 microns in size
RWQCB	Regional Water Quality Control Board
SDAB	San Diego Air Basin
TPH	total petroleum hydrocarbon
USFWS	U.S. Fish and Wildlife Service
VOC	volatile organic compounds
WDR	Waste Discharge Requirements

1.0 INTRODUCTION

1.1 Purpose and Document Organization

This Initial Study and Negative Declaration have been prepared on behalf of the Colorado River Basin Regional Water Quality Control Board (Regional Water Board) in accordance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., and its implementing regulations, the CEQA Guidelines set forth in Title 14 of the California Code of Regulations Section 15000 et seq. The purpose of this environmental document is to evaluate the potentially significant effects of the proposed project on the environment—the installation and operation of a sprinkler system to discharge remediated groundwater onto vacant land, which is owned by Kinder Morgan Energy Partners (KMEP) and adjacent to the Kinder Morgan Liquid Fuels Terminal (KMLQT), LLC, in the City of Imperial, California.

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All inquiries regarding environmental compliance for this proposed Project, including comments on this environmental document, should be addressed to Ms. Snyder.

This document is organized as follows:

- Chapter 1 - Introduction
  This chapter provides an introduction to the proposed Project and describes the purpose and organization of this document.
- Chapter 2 - Project Description
  This chapter describes the reasons for the proposed Project, scope of the proposed Project, and project objectives.
- Chapter 3 - Environmental Impacts
  This chapter identifies the significance of potential environmental impacts and evaluates the potential impacts identified in the CEQA Environmental Initial Study (IS) Checklist.
- Chapter 4 - References
  This chapter identifies the references and sources used in the preparation of this IS.
- Chapter 5 - Report Preparation
  This chapter provides a list of those involved in the preparation of this document.

1.2 CEQA Review Requirements

CEQA applies to discretionary projects proposed to be carried out or approved by California public agencies (CEQA Section 21080(a)). For such projects, CEQA requires that the public agency with the primary responsibility for carrying out or approving the project, referred to as the Lead Agency (CEQA Section 21067), determine whether the proposed project may have a significant effect on the environment based on substantial evidence in light of the whole record (CEQA Section 21082.2). The Lead Agency for this Project is the Colorado River Basin Regional Water Board.

CEQA requires the Lead Agency to conduct a preliminary review to determine whether an activity is a project subject to CEQA (CEQA Guidelines Section 15060) and if so, whether the project is exempt from CEQA pursuant to statutory or categorical exemptions specified (CEQA Guidelines Section 15061). If the project is not exempt from CEQA, then the Lead Agency conducts an Initial Study to determine if the project may have a significant effect on the environment (CEQA Guidelines Section 15063).

An Initial Study (IS) is conducted by the Lead Agency to determine if a project may have a significant effect on the environment (CEQA Guidelines Section 15063[a]). If there is substantial evidence, in light of the whole record before the lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) must be prepared (CEQA Guidelines Section 15064(a)). If there is no substantial evidence that the project may cause a significant effect on the environment, however, then a Negative Declaration must be prepared (CEQA Guidelines Sections 15063(b)(2) & 15070). A Mitigated Negative Declaration must be prepared if the IS identifies potentially significant effects, but revisions in the project plans or proposals made by or agreed to by the applicant mitigate the potentially significant effects to a less than significant level, and there is no substantial evidence, in light of the whole record before the lead agency, that the project as revised may have a significant effect on the environment (CEQA Guidelines Section 15070(b)(1) & (2)).

Based on this IS, it was determined that implementation of the proposed project would not result in any significant effects on the environment. Therefore, a Negative Declaration shall be prepared.

1.3 Remediation History of the KMLQT Site

Kinder Morgan Energy Partners (KMEP) operates the Kinder Morgan Liquid Terminals Fuel Terminal site (KMLQT) in the City of Imperial, California (the KMLQT Site, or Site). The Site is an active fuel loading, storage, and transportation facility located at 345 West Aten Road in the City of Imperial. The Site encompasses approximately 30 acres with 27 aboveground storage tanks (ASTs) containing gasoline and diesel fuels. There are no underground storage tanks at the Site.

In 1995, two separate releases of petroleum products were identified and reported at the Site. They are referred to as the “North Plume” and the “South Plume.” The principal contaminants of concern (COCs) in these two plumes are total petroleum hydrocarbons (TPH). Based on the identification of the two plumes, eleven groundwater monitoring wells (MWs) were installed at the Site, and quarterly groundwater monitoring was initiated.

In 1996, an additional five groundwater MWs were installed at the Site. Two years later (1998), an additional nine groundwater MWs were installed at the Site for a total of 25 MWs. Also, a multi-phase extraction (MPX) unit was installed in the South Plume to remove free product (liquid-phase hydrocarbons or LPH), and dissolved phase hydrocarbons.

In January 2001, another fuel release was identified and reported on the northern portion of the site. That July, the MPX unit was transferred to the North Plume after product levels in the South Plume declined to non-detect levels. However, a few months later, LPH was again detected in the South Plume.

In September 2002, another fuel release was identified and reported on the northern portion of the Site. The following May (2003), trichloroethene (TCE) was detected in three MWs, which indicated a potential release in the northwest portion of the Site, based on the location of the three MWs. The source of the TCE release was not identified, however. Eight additional MWs were then installed at the Site for a total of 33 MWs.

In February 2004, a soil-vapor extraction (SVE) unit was installed and operated at the South Plume. That April, a release of diesel fuel was identified and reported near Tank 21 in the southeastern portion of the Site. This plume is referred to as the "Tank 21 Plume." Five additional groundwater MWs were then installed for a total of 38 MWs. Also, an air sparge/SVE unit was installed in the location of the previously reported (May 2003) TCE release.

In July 2005, the SVE unit operation in the South Plume was discontinued.

In November 2005, a release from a surface pipeline was identified and reported. In response to the release, approximately 1,872 cubic feet of soil was excavated from the Site.

In June 2006, the MPX system was shut down in the North Plume area due to the reported ineffectiveness at removing LPH from fine-grained soils and due to other operating issues. The next month (July), weekly bailing of the LPH from selected MWs began.

In August 2006, fourteen additional groundwater MWs were installed at the Site to monitor LPH for a total of 52 MWs.

In January 2007, a release was identified and reported at the northwest portion of the Site. Nineteen temporary wells were installed for the purpose of LPH recovery. The wells were referred as Product Recovery Wells. Groundwater monitoring and reporting were reduced from quarterly to semi-annually.

In May 2007, a vacuum truck was used to extract LPH from the Product Recovery Wells. However, the results were minimal due to the low yield of the fine-grained soils at the Site. Also, the air sparge/SVE system was shut down due to declining influent TPH concentrations.

In October 2007, four "Sentinal" MWs were installed off-site to monitor plume migration for a total of 56 MWs.

In late 2007, a TCE Pilot Test was conducted to further characterize the TCE plume and to conduct a pilot injection test to evaluate the feasibility of implementing an in-situ groundwater remediation system. Data collected indicated that the TCE plume was stable and was not migrating off-site, but that due to non-uniform dispersion and requirements for close spacing of injection points, it was determined that injection might not be the ideal remediation strategy. As a result, "pump and treat" and trench barrier options were discussed, but it was decided that these options would require further evaluation and analysis before full scale implementation.

In April 2008, a release from Tank IP-13 was identified and reported. In response, eight cubic yards of soil were excavated from the Site.

In May 2008, the first semi-annual groundwater monitoring event took place. Groundwater samples were collected from 34 of the 56 MWs. Eighteen MWs had measureable amount of LPH and thus, were not sampled. The MWs that were sampled revealed concentrations of TPH-gas, TPH-diesel, MTBE, chloroform, benzene, toluene, ethylbenzene, and xylenes (BTEX), 1,2-DCA, and TCE significantly above Maximum Contaminant Levels (MCLs), if specified.

In November 2008, the second semi-annual groundwater monitoring event took place. During this round of sampling, groundwater samples were collected from 30 of 51 MWs, and 2 of 19 Product Recovery Wells. LPH ws detected in 19 MWs and 16 Product Recovery Wells. A similar suite of chemical constituents was detected in the MWs sampled, and results revealed similarly elevated levels above MCLs.

The second semi-annual monitoring event conducted in November 2009 again showed similarly elevated levels of chemical constituents above MCLs. TPH was the principal constituent of concern in the groundwater.

In November 2009, an Authority to Construct (ATC) permit (#3944) was granted to KMEP for the proposed Groundwater Treatment System (GWTS) by the Imperial County Air Pollution Control District for constructing and operating the proposed Oil/Water Separator (OWS) and the GWTS.

In April and May 2010, KMEP constructed a proposed Product Barrier Trench (PBT) and the proposed GWTS and OWS at the Site to prevent offsite migration of LPH. The PBT/GWTS consists of three product recovery wells in a semi-permeable product recovery trench along the western property boundary of the Site. Two piezometers installed are used to gauge recovered product levels in the trench and will be part of the PBT/GWTS.

According to the second semiannual 2010 groundwater monitoring report (November 2010??] (CH2MHILL Monitoring, 2010), the estimated plume sizes of liquid-phase hydrocarbon (LPH) within each of the three areas of concern were approximately: 3.1 acres for the North Plume; 0.4 acres for the South Plume; and 0.06 acres for the Tank 21 Plume.

Currently, groundwater remediation consists of total fluids extraction (product and groundwater). After being extracted from the PBT, groundwater passes through the OWS. Based on previous hydrologic data collected at the KMLQT Site, the average operational flow from the PBT and through the GWTS was anticipated to be 1 gallon per minute (gpm), but a maximum of 10 gpm was designed to provide additional treatment capacity, if necessary. Recovered LPH is periodically recovered from the OWS by a licensed transportation and disposal provider and is recycled at a permitted offsite facility in accordance with applicable state and federal regulations. Extracted groundwater is then treated by liquid-phase granular activated carbon (LGAC) to further reduce TPHs to negligible concentrations.

Following treatment, treated groundwater is then discharged into a 5,000-gallon Baker tank for holding prior to the proposed discharge to land via the proposed sprinkler system (the Project). The Baker tank is equipped with a high level switch that, when triggered, will initiate the discharge pump to empty the Baker tank. Further discussion of the treated water disposal is discussed in Section 2.0, Project Description.

1.4 Summary of Findings

Based on the IS and supporting environmental analysis provided in this document, the proposed Project will not result in any significant impacts to the environment. The following environmental areas were addressed in the IS:

- Aesthetics
- Agricultural Resources
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas (GHG) Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems
- Mandatory Findings of Significance

Based on the IS and supporting environmental analysis provided in this document, the proposed Project has been determined to cause less than significant impacts in the following environmental areas:

- Air Quality
- Noise
- Transportation and Traffic

2.0 PROJECT DESCRIPTION

2.1 Proposed Project

The proposed Project is to install and operate a sprinkler system to discharge the remediated groundwater from the existing GWTS at the KMLQT.Site. The KMLQT Site and the GWTS are located immediately adjacent to the proposed sprinkler site. Both sites are owned by Kinder Morgan Energy Partners (KMEP). The existing GWTS is discussed in detail in section 1.3 of this document.

KMEP is proposing to apply treated groundwater to the vacant, adjacent KMEP property via a low-profile sprinkler system under Waste Discharge Requirements (WDRs) issued by the Regional Water Board. For the purposes of this Initial Study, the proposed Project is limited to the discharge sprinkler system, which will be installed and operated entirely on the proposed Project area. The proposed Project is located in an urbanized area of the City of Imperial, Imperial County, California (Figure 1).

It is anticipated that the average discharge flow rate from the Baker tank to the sprinklers will be approximately 15 gpm, but will be adjustable to achieve lower flow or higher discharge flow, as desired. The maximum design flow capacity of the discharge pump associated with the system is 25 gpm, and each of the proposed three sprinkler heads are rated for a maximum flow of 7.8 gpm. The sprinkler system will be designed to disperse treated groundwater onto vacant land and is anticipated to provide a reduction in the volume of treated groundwater applied to land application by utilizing evaporation. The projected average discharge rate of 15 gpm is not anticipated to result in the ponding of discharge water in the Project area due to the high rate of evaporation prevalent in the arid climate of the City of Imperial. As a result, the majority of the treated groundwater discharged via this sprinkler system is expected to evaporate. If ponding is observed to occur, however, the rate of discharge will be reduced.

In addition, because the treated groundwater will be in compliance with the effluent limitations specified in the WDRs for volatile organic compounds (VOC), land application of the treated groundwater is not expected to increase VOC emissions such that the amount of required VOC offset of 1.47 tons per year (due to the emissions from the OWS) would increase. KMEP believes that an application for an Authority to Construct (ATC) permit revision for the OWS is not necessary for this minor change to the water discharge because the proposed change will not affect the equipment descriptions in Permit 3944 or the amount of emission offset required for this permit.

2.2 Existing Conditions

The proposed Project area, shown in Figure 2, is adjacent to the active KMEP Terminal and is KMEP-owned land. The proposed Project area where the sprinkler system will be installed is a vacant, previously disturbed parcel, approximately 3 acres in size. Historically, the land was used for agricultural purposes, but all activity has ceased since 1987.

Groundwater in the proposed Project area is shallow (8 to 11 feet below ground surface) and the soil type is generally sandy silts and clays. Based on the second semi-annual 2009 monitoring event (CH2MHILL 2010) and previous monitoring results, the predominant groundwater flow direction was north-northeast toward the regional low at the Salton Sea. The groundwater elevation map showed two depressions at the south-central and northern portions of the proposed Project area. The gradient across the south-central portion of the proposed Project area was 0.0027 foot per foot (ft/ft). The

gradient across the northern and northeastern portion of the proposed Project area ranged from 0.017 ft/ft to 0.0017 ft/ft.

2.3 Proposed Project Facilities

The proposed Project would consist of the installation and operation of a Groundwater Treatment Discharge Sprinkler System on the adjacent KMEP vacant property. The proposed locations of the treated water sprinkler systems are shown in Figure 3.

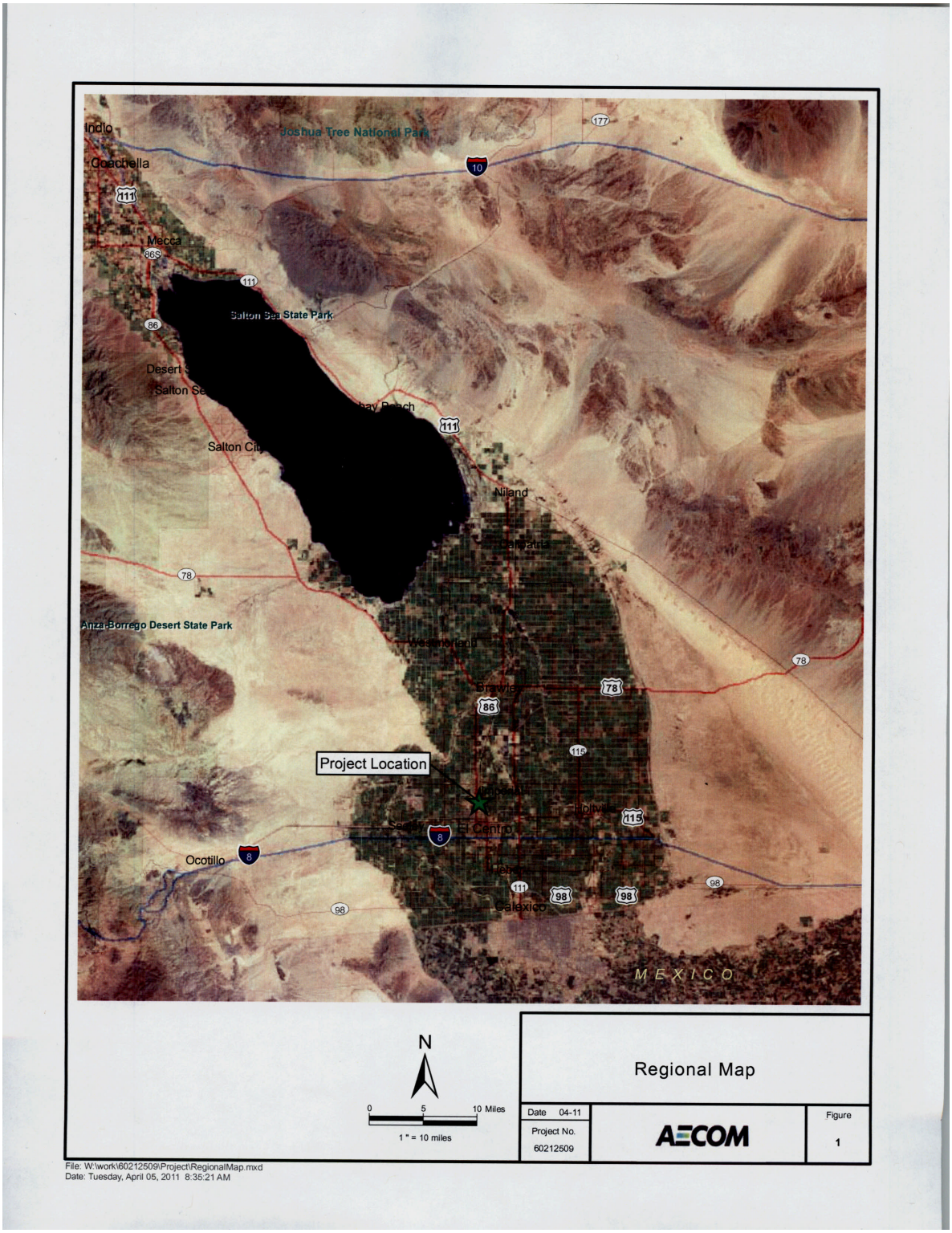
Following treatment in the above mentioned remediation system, the treated groundwater would be discharged into a 5,000-gallon Baker tank at an average flow rate of one gpm or less. The treated effluent would then be discharged from the 5,000-gallon Baker tank via the sprinkler system in batches at an average flow rate of approximately 15 gpm. The maximum design flow capacity of the treatment system into the Baker tank is 10 gpm. The maximum design flow capacity of the proposed discharge system from the Baker tank to the sprinklers is 25 gpm.

The sprinkler system is designed to disperse treated groundwater onto the proposed Project area and is anticipated to provide a reduction in the volume of treated groundwater absorbed by utilizing evaporation. The City of Imperial has an arid desert climate and is one of the hottest cities in the United States. Accordingly, evaporation is anticipated to be significant due to the arid climate.

2.4 Reviewing Agencies

The agencies listed below will be consulted and will participate in review of the IS/ND to ensure project compliance with applicable rules and regulations.

- U.S. Fish and Wildlife Service (USFWS);
- California Air Resources Board (CARB) – CEQA reviewing agency;
- California Department of Fish and Game (CDFG);
- City of Imperial; and
- Imperial County Air Pollution Control District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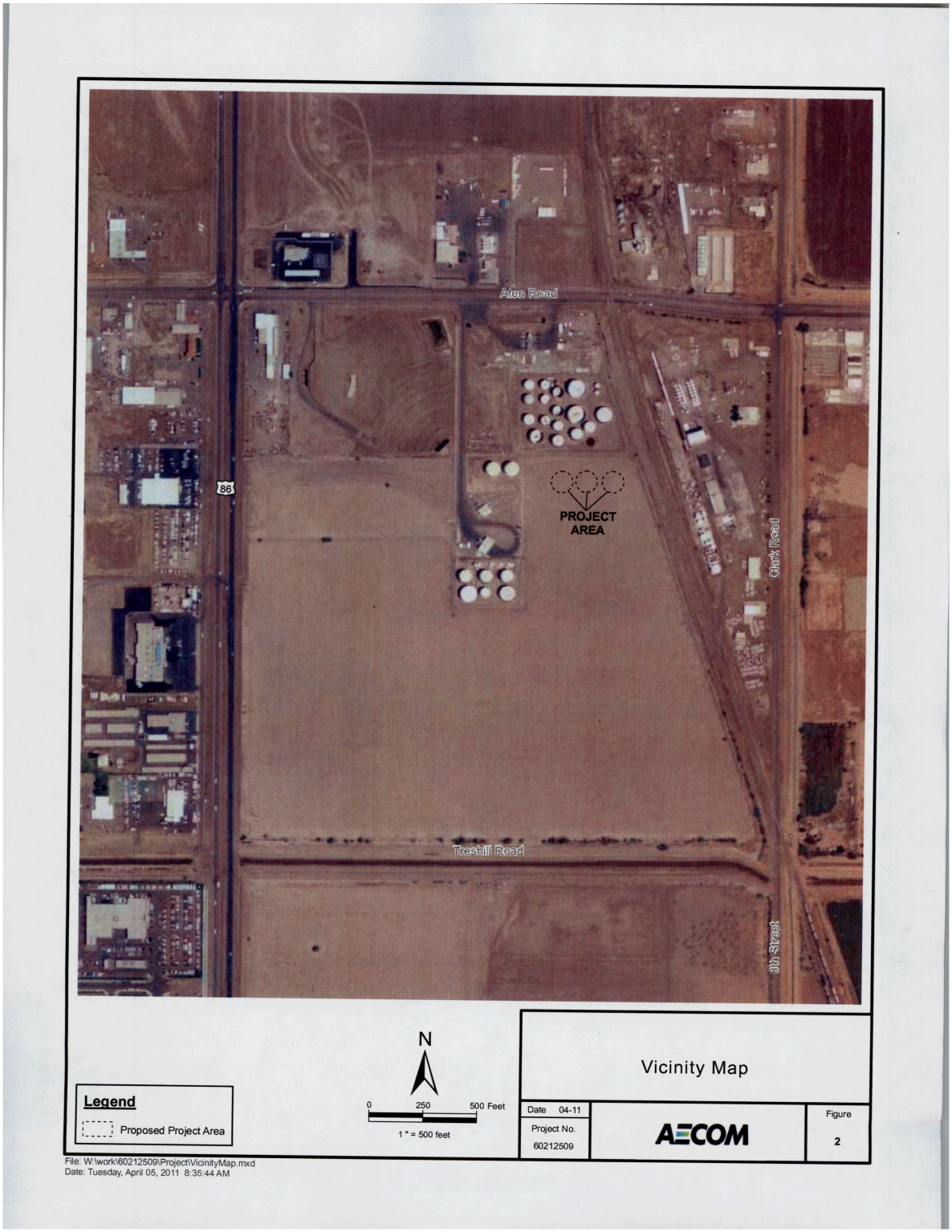
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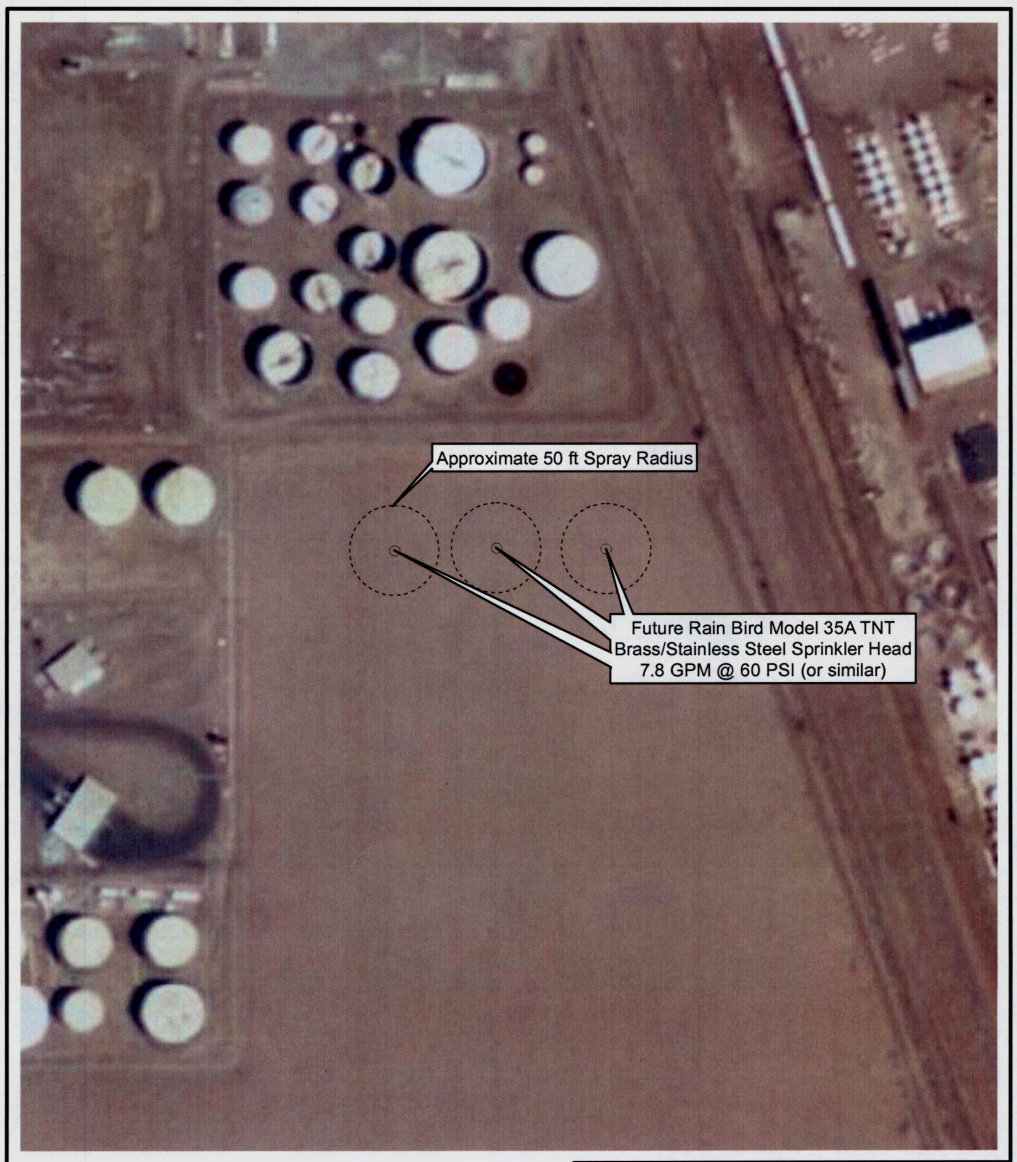
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Brass/Stainless Steel Sprinkler Head
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3.0 ENVIRONMENTAL IMPACTS

3.1 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this proposed Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology/Soils
☐ Hazards & Hazardous Materials	☐ Hydrology/Water Quality	☐ Land Use/Planning
☐ Mineral Resources	☐ Noise	☐ Population/Housing
☐ Public Services	☐ Recreation	☐ Transportation/Traffic
☐ Utilities/Service Systems	☐ Mandatory Findings of Significance	

3.2 Determination

On the basis of this initial evaluation:

☒ I find that the proposed Project COULD NOT have a significant effect on the environment, and a Negative Declaration will be prepared.

☐ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the proposed Project have been made by or agreed to by the applicant. A Mitigated Negative Declaration will be prepared.

☐ I find that the proposed Project MAY have a significant effect on the environment, and an EIR is required.

☐ I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been analyzed by mitigation measures based on the earlier analysis as described on attached sheets. An EIR is required, but it must analyze only the effects that remain to be analyzed.

☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

_____ _____

Signature Date

3.3 Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take into account the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Mitigated Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a. **Earlier Analysis Used.** Identify and state where they are available for review.

    b. **Impacts Adequately Analyzed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were analyzed by mitigation measures based on the earlier analysis.

    c. **Mitigation Measures.** For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. A list of supporting information sources should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify a) the significance criteria or threshold, if any, used to evaluate each question; and b) the mitigation measure identified, if any, to reduce the impact to less than significance.

3.4 Environmental Issues

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS: Would the Project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☒
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Discussion:

a) and b) No scenic vistas or scenic resources located within a state scenic highway exist in the vicinity of the Site. Therefore, the proposed Project would not affect scenic vistas or scenic resources within a state scenic highway. **No impacts are anticipated and no further analysis is determined necessary.**

c) The sprinkler piping will be installed on top of the vacant land and connected to the existing pipe connections on the adjacent KMLQT. The implementation of the proposed Project would not result in the degradation of the existing visual character or quality of the proposed Project area and its surroundings. **No impacts are anticipated and no further analysis is determined necessary.**

d) No new lighting is proposed as a part of the Project. Therefore, no new source of light or glare would adversely affect day or nighttime views in the area. **No impacts are anticipated and no further analysis is determined necessary.**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the Project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

Discussion:

a), b), and c) Historically, the proposed site was leased out for Agricultural use; but all such activities ceased in 1987. All operational activities that would occur as a result of implementing the proposed Project will occur on the existing vacant, adjacent KMEP land. The project activities will not alter the existing environment. According to the State Department of Conservation, under the Farmland Mapping and Monitoring Program, the proposed Project area does not include any soils considered to be prime, unique or farmland of statewide importance, nor are any parcels zoned for agriculture use or under a Williamson Act contract. The proposed Project area is considered to be Urban and Built-Up Land. **No impacts are anticipated and no further analysis is determined necessary.**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:				
a) Conflict with or obstruct implementation of the applicable Air Quality Attainment Plan	☐	☐	☐	☒
b) Violate any air quality standard or contribute to an existing or projected air quality violation?	☐	☐	☒	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	☐	☐	☐	☒
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

Discussion

a) The proposed Project is located in the San Diego Air Basin (SDAB), which encompasses Imperial County. The SDAB currently meets National Ambient Air Quality Standards for all pollutants except ozone, and State standards for all pollutants except ozone and fugitive dust (particulate matter less than 10 microns [PM10]). The SDAB is classified as a non-attainment area for ozone and PM10. Since the proposed Project does not have an earthwork component, impacts associated with construction equipment and machinery and operations emissions will not exist. **No impacts are expected and no further analysis is determined necessary.**

b) As indicated above, the proposed Project is located within the SDAB. Operation of the proposed Project may result in a minor increase in emissions of VOCs due to the evaporation process. The proposed Project would not violate any air quality standard or contribute to an existing or projected air quality violation. **Impacts are expected to be less than significant and no further analysis is determined necessary.**

c) The proposed Project does not have the capability to emit ambient pollutants, such as ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, PM10 and particulate matter less than 2.5 microns. Therefore, the proposed Project will not result in a cumulatively considerable net increase of any

criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard. **No impacts are expected and no further analysis is determined necessary.**

d) Operation of the proposed Project would incrementally increase air emissions. The nearest sensitive receptor is Valley Christian Heritage School which is located one mile from the proposed Project area. The nearest residential area is located approximately 1.5 miles to the west and the nearest public park is approximately 2.5 miles to the southwest. **Due to the nature of the project, and the distance of the closest sensitive receptors, no impacts are expected and no further analysis is determined necessary.**

e) As the proposed Project would involve the discharge of treated water onto vacant land, the potential for odors from residual or released product is minimal. **Therefore, no impacts are expected and no further analysis is determined necessary.**

	Potentially Significant Impact	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
IV. BIOLOGICAL RESOURCES: Would the Project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or USU.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (Including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion:

a) A California Natural Diversity Database search was conducted which yielded occurrences of 29 species in the proposed Project area. The nearest element occurrence was observed approximately 1.5 miles from the proposed Project area. A site visit was conducted by an AECOM biologist on March 29, 2011. The proposed Project area is currently barren and devoid of vegetation and therefore has limited suitability for most wildlife and plant species. However, during the site visit, a burrow was observed on the perimeter of the vacant lot, which contained signs of possible use by burrowing owl *(Athene cunicularia*). Although the proposed Project area did not contain the burrow and does not involve ground disturbance activities, any type of disturbance in the vicinity of an active burrowing owl burrow could disturb the species. However, due to the nature of the proposed Project and the absence of earthwork activities, **no impacts are expected to occur and no further analysis is determined necessary.**

b) The site is not located in or near any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFG or USFWS. **Due to the nature of the project, no impacts are expected and no further analysis is determined necessary.**

c) The proposed Project is not anticipated to have an impact on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.). There are no wetlands located on the proposed Project area; however an earthen v-ditch parallels the eastern boundary of the vacant lot. No wetland vegetation is associated with this canal. The proposed Project will occur outside of this channel and the effluent water discharged will be in compliance with State water standards with negligible VOC levels. **No impacts are expected to occur and no further analysis is determined necessary.**

d) The proposed Project area is located in an industrial area of the City of Imperial. Current wildlife movement opportunities are limited and the proposed Project will not interfere with the future movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. **No impacts are expected to occur and no further analysis is determined necessary.**

e) The County of Imperial does not have any policies or ordinances protecting biological resources. The Conservation Element of the City of Imperial's General Plan contains a Wildlife Conservation directive whose objective is to "[c]onserve and protect sensitive wildlife habitat areas identified as such by the California Department of Fish and Game." The following are excerpts from the City of Imperial Conservation Element:

D. Protect burrowing owl habitat to the maximum extent feasible.

E. Prevent premature removal of burrows in canal and drain banks due to construction activity.

F. Coordinate with the State Department of Fish and Game to facilitate relocation of owls to other suitable habitats when necessary.

The proposed Project area does not function as high-quality burrowing owl habitat, and since there will be no ground disturbance on site; **no impacts are expected to occur and no further analysis is determined necessary.**

f) The entire County of Imperial is not within the jurisdiction of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As such, implementation of the proposed Project would not conflict with the provisions of any such plans. **No impacts are expected and no further analysis is determined necessary.**

	Potentially Significant Impact	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
V. CULTURAL RESOURCES: Would the Project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5?	☐	☐	☐	☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

Discussion:

a) Buildings, structures, and other potential historical resources that are 50 years old or older are listed in the National Register of Historic Places. The proposed Project area is on existing vacant land that has been previously disturbed. No prehistoric, historical, or architectural resources as defined in Section15064.5 of the CEQA guidelines exist on site. Project activities will not include the disturbance of any potentially present above or below ground historical resources. **Therefore, no impacts are expected and no further analysis is determined necessary.**

b) and c) Implementation of the proposed Project would occur on previously disturbed land. Since project activities will not include the disturbance of any potentially present above or below ground archaeological or paleontological resources, **no impacts are expected and no further analysis is determined necessary.**

d) The proposed Project would not include the disturbance of soil, so human remains will not be uncovered. However, in the unlikely event human remains are discovered, the City of Imperial's Coroner's office will be immediately called and all work stopped. The Native American Heritage Commission would also be contacted. **No** i**mpacts are expected and no further analysis is determined necessary.**

	Potentially Significant Impact	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
VI. GEOLOGY AND SOILS: Would the Project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☐	☒
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c) Be located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒

Discussion:

a) The proposed Project area lies within a seismically active region subject to the effects of moderate to large earthquake events along major faults. The regional faults that may affect the area include the Rose Canyon, Coronado Bank, La Nacion, Elsinore, San Jacinto, and San Andreas faults, all between 15 and 30 miles from the proposed Project area. Ground rupture is typically associated with moderate to severe earthquakes occurring along active fault lines. Since the proposed Project is the discharge of treated water, it would not substantially increase the exposure of people or structures to risk of loss, injury, or death as a result of seismic activity, creating a less than significant impact to people from seismic events. **Due to the nature of the proposed Project, no impacts are expected and no further analysis is determined necessary.**

b) There are no earthwork activities as part of the proposed Project. The possibility does not exist for temporary or permanent erosion resulting from earthwork activities. **No impacts are expected and no further analysis is determined necessary.**

c) As described above, the proposed Project area is located in an already disturbed flat vacant land. No earthwork activities are proposed as a part of the project. The proposed Project will not affect the stability of the soil, nor result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. **No impacts are expected and no further analysis is determined necessary.**

d) Soils in the vicinity of the proposed Project are not considered to be expansive. **Therefore, no impacts are expected and no further analysis is determined necessary.**

	Potentially Significant Impact	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
VII. GREENHOUSE GAS EMISSIONS: Would the Project:				
a) Generate greenhouse emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Discussion:

a) and b) Assembly Bill 32, the Global Warming Solutions Act of 2006, requires that California's Greenhouse Gas (GHG) emissions be reduced to 1990 levels by the year 2020. As such, the potential environmental impact(s) of GHG emissions must be addressed during environmental reviews, such as those conducted under CEQA.

Operation of the proposed Project would not result in short-term or long-term GHG emissions. The only operating equipment will be the sprinkler system discharging the treated water. There will be no construction or large equipment needed to operate. There will be no emissions related to construction

equipment, daily operations of buildings (e.g., from water heating, space heating, and electrical use), or from vehicle emissions. **Project impacts associated with GHG emissions are not expected to occur. Therefore, no impacts are expected and no further analysis is determined necessary.**

	Potentially Significant Impact	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
VIII. HAZARDS AND HAZARDOUS MATERIALS: Would the Project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the Project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

Discussion:

a) and b) All applicable Federal, State, and local safety regulations would be implemented during operation of the proposed Project. The proposed Project is the installation and operation of a groundwater treatment discharge system. The operation of the system will be the dispersal of treated water via a sprinkler system. Due to the nature of the project there will be no routine transport of any type of hazardous materials, which alleviates the possibility of an accidental release of hazardous materials into the environment. **No impacts are expected to occur and no further analysis is determined necessary.**

c) There are no schools currently located within one-quarter mile of the proposed Project area (Google Earth 4.3, 2008). Valley Christian Heritage School is the closest school to the proposed Project area, located approximately one mile to the west. Additionally, no schools are planned for development in the proposed Project area (Imperial County Planning and Development Services 2010).**Therefore, the proposed Project would result in no impact to existing or proposed schools within a one-quarter mile of the project area and no further analysis is required.**

d) The proposed Project area is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, **no impacts are expected and no further analysis is determined necessary.**

e) The proposed Project area is located within the Airport Compatibility Plan area of the Imperial County Airport, which is a public use airport located within two miles of the proposed Project area. However, the proposed Project entails the application of treated water to vacant land via sprinklers under a WDR permit. The proposed land use meets the compatibility criteria identified in the Airport Compatibility Plan (Imperial County Planning and Development Services 1996). **Therefore, no safety hazards are expected from the proposed Project on public use airports in the area and no further analysis is determined necessary.**

f) No private airstrips are located within the project area. **Therefore, the proposed Project would not result in a significant impact to people residing or working in the project area associated with a private airstrip and no further analysis is determined necessary.**

g) The proposed Project entails the application of treated water to vacant land via sprinklers under a WDR permit. **Therefore, the proposed Project would result in no impact associated with the impairment of, or physical interference with, an adopted emergency or evacuation plan and no further analysis is determined necessary.**

h) The proposed Project area is not located in or near wildlands, and therefore will not increase the risk of fires in wildlands. Risk of upset associated with other potential hazards are addressed under topics a)and b), above. **No impact with respect to wildland fires would result from construction and operation of the proposed Project and therefore, no further analysis is determined necessary.**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY: Would the Project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off- site?	☐	☐	☐	☒
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off- site?	☐	☐	☐	☒
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving	☐	☐	☐	☒

flooding, including flooding as a result of the failure of a levee or dam?				
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Discussion:

a) Treated groundwater will conform to the relevant regulatory standards for discharge onto the ground surface. The proposed Project will be consistent with applicable State and local environmental permitting requirements including, but not limited to:

- WDRs;
- Water quality standards, including WDRs and storm water discharge requirements issued by the State Water Resources Control Board and the Colorado River Basin RWQCB; and
- Air quality rules including those governing VOCs.

The proposed Project will involve the installation and operation of the water discharge sprinkler system to the vacant land. No construction or drilling activities would occur that could result in temporary increases in storm water runoff-related soil erosion and discharges of construction-related contamination from the project area. **Therefore, no impacts are expected and no further analysis is determined necessary.**

b) The proposed Project will not deplete groundwater supplies or interfere with groundwater recharge. The proposed Project will discharge treated water at a maximum of one gpm and pumping will be periodically turned off to allow LPH levels to recover. Proposed Project activities will not significantly lower the water table**. Therefore, no impact to the local aquifer is expected and no further analysis is determined necessary.**

c) The proposed Project will not substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site through implementation of mitigation. The proposed Project will discharge water at a maximum rate of one gpm or less using a sprayer/mister system. Most of the discharged water is expected to evaporate due to the arid climate of the project area. The remaining water will percolate into the subsurface. The discharge system will be monitored periodically and adjusted accordingly to ensure that no substantial runoff occurs during its operation.

There are no creeks, rivers, or other waterways located within or adjacent to the project area. No long-term changes or impacts to drainage patterns within the project area are anticipated. **Therefore, no impacts are expected and no further analysis is determined necessary.**

d) The proposed Project would not substantially alter the existing drainage pattern of the proposed Project area or surrounding area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site. The proposed Project will discharge treated water at a maximum of one gpm. These impacts are expected to be minimal due to the expected evaporation of the water. No changes to local drainage and runoff patterns due to project activities are anticipated. **Therefore, no impacts are expected and no further analysis is determined necessary.**

e) The proposed Project would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. The purpose for this proposed Project is to not utilize these systems. The proposed Project will discharge treated water at a maximum of one gpm onto to the vacant land. **Therefore, no impacts are expected and no further analysis is determined necessary.**

f) The proposed Project will enable the KMLQT to discharge the treated water from their extraction wells, which would continue to improve groundwater quality. **Therefore, it will not degrade water quality. As a result, no impacts are expected and no further analysis is determined necessary.**

g) The proposed Project would not place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. Implementation of the proposed Project will not result in existing or planned housing to fall within a 100-year flood hazard area. In addition, the project area is outside 100-year floodplains (Imperial County 2007). **No impacts are expected and no further analysis is determined necessary.**

h) There is no proposed construction of any building as part of the proposed Project. Therefore, there is no possibility that structures would be placed within a 100-year flood hazard that would impede or redirect flood flows. **No impacts are expected and no further analysis is determined necessary.**

i) The proposed Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. As discussed above, the proposed Project area is located in an area of minimal flooding. All large bodies of water, including the Salton Sea, are located downgradient from the project area. **No impacts are expected and no further analysis is determined necessary.**

j) The proposed Project would not result in inundation by seiche, tsunami, or mudflow. The proposed Project area is located at least 90 miles from the nearest ocean and approximately 20 miles from the nearest body of water (Salton Sea). Therefore, it is not vulnerable to seiches or tsunamis. The Site is also located on a flat plain and is not vulnerable to mudflow. **No impacts are expected and no further analysis is determined necessary.**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING: Would the Project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Discussion:

a) The proposed Project will be located on previously disturbed vacant land and will not include any components that could physically divide the surrounding community. **No impacts are expected and no further analysis is determined necessary.**

b) The proposed Project is consistent with all applicable State and local land use plans, policies, and regulations. However the proposed Project is located within the jurisdiction of the Imperial County Airport Land use commission and is subject to that agency's adopted Airport Land use Compatibility Plan. The Plan sets forth land use compatibility criteria based on geographic proximity to runways air traffic patterns, aircraft types, and various other facts. The proposed Project falls into Land Use Zone B-1. Due to the nature of the proposed Project and that no structures of any kind are proposed; the proposed Project will not result in a safety hazard for people residing or working in the proposed Project area. **Therefore, no impacts are expected and no further analysis is determined necessary.**

c) The entire County of Imperial is not within jurisdiction of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As such, implementation of the proposed Project would not conflict with the provisions of any such plans. **No impacts are expected and no further analysis is determined necessary.**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES: Would the Project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Discussion:

a) and b) The proposed Project will take place entirely on previously disturbed vacant land. According to the City of Imperial Land Use Map and Zoning Map, there are no mineral resources or mineral resource extraction operations at the Site or in the surrounding vicinity.

There are no provisions in the proposed Project that would result in the loss of availability of a known mineral resource of value to the region and the residents of the State such as aggregate, coal, clay, shale, etc, or of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. **Therefore, no impacts are expected to occur and no further analysis is determined necessary.**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE				
a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?	☐	☐	☒	☐
b) Would the project result in exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?	☐	☐	☒	☐
c) Would the project result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without	☐	☐	☒	☐

the Project?				
d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒

Discussion:

a), b), c), and d) Implementation of the proposed Project will occur within previously disturbed and vacant land. The proposed Project area is zoned in a General Commercial area. The existing noise environment at the proposed Project area typically consists of noise from existing equipment on the adjacent site and maintenance activities. Operation activities associated with the proposed Project would generate noise and ground-borne vibration associated with the use of a sprinkler system. It is assumed that noise levels produced by project activities are significantly lower than the ambient noise and would not exceed any regulatory limits. **Impacts are expected to be less than significant and no further analysis is determined necessary.**

e) and f) The proposed Project area is located within the Imperial County Airport Land Use Compatibility Plan and with the compatibility of “B-1” airport land use plan. The proposed Project is within two miles of a public airport, but no private airstrip exists near the proposed Project. Due to the nature of the proposed Project, it will not expose people residing or working in the proposed Project area to airport-related excessive noise levels. **No impacts are expected and no further analysis is determined necessary.**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING: Would the Project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion:

a) The proposed Project does not contain any residential component that would induce substantial direct population growth in the area. The proposed Project is located on a previously disturbed and vacant land within a developed area of the City of Imperial and as such, no new roadways or regional infrastructure (i.e., water or wastewater lines) would be required to service the Site. The proposed Project would not generate employment opportunities. Since the proposed Project contains no residential component, it will not attract a substantial workforce from outside the region, nor construct infrastructure that would facilitate new areas to be developed. **Therefore, there would be no impact with respect to direct or indirect substantial population growth and no further analysis is determined necessary.**

b) The proposed Project would be developed on previously disturbed vacant land and would not require the demolition or relocation of any existing housing. Since no housing would be removed, the proposed Project would not result in the requirement for the construction of replacement housing elsewhere. **No impacts are expected and no further analysis is determined necessary.**

c) The proposed Project would not require the displacement of people. As discussed above, no existing housing would be removed or relocated and no occupants of any housing would be displaced as a result of the proposed Project. Since no people would be displaced, the proposed Project would not require the construction of replacement housing elsewhere. **No impacts are expected and no further analysis is determined necessary.**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	☐	☐	☐	☒
b) Police protection?	☐	☐	☐	☒
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

Discussion:

a) ,b), c), d), and e) The proposed Project would not cause physical impacts that would adversely affect existing or future anticipated governmental or other public facility services nor would the proposed Project require the construction of new facilities in order to maintain acceptable services for fire and police protection. In addition, as described above, the proposed Project is not expected to result in a direct or indirect population increase such that there would be a substantial increased demand for parks, libraries, or other public facilities. Since the proposed Project would not directly increase residential population through housing, or indirectly increase population by substantially increasing the region's permanent employment base, impacts with respect to parks, libraries or other governmental services, **no impacts are expected to occur and no further analysis is determined necessary.**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. RECREATION				
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion:

a) and b) Implementation of the proposed Project will not cause substantial direct or indirect population growth or an associated increase in the use of an existing neighborhood and regional parks or other recreational facilities. Further, the proposed Project will be located on existing previously disturbed vacant land and will not affect existing nearby parks or other recreational facilities. The proposed Project does not include the construction or expansion of recreational facilities and, thus, will not have an adverse physical effect on the environment. Since the proposed Project would not directly increase residential population through housing, or indirectly increase population by increasing the region's permanent employment base, **no impacts are expected and no further analysis is determined necessary.**

	Potentially Significant Impact	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
XVI. TRANSPORTATION/TRAFFIC: Would the Project:				
a) Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☐	☒	☐
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Result in inadequate parking capacity?	☐	☐	☐	☒

Discussion:

a) Permanent operation-related traffic associated with the proposed Project would occur monthly and would only minimally contribute to the existing traffic on project area roads. Consequently, additional operation-related trips associated with maintenance of the proposed Project would not substantially increase traffic in relation to the existing traffic load or roadway capacity. The minimal additional traffic associated with the project's maintenance would not exceed the capacity of the existing circulation system. **Therefore, this impact would be less than significant and no further analysis is determined necessary.**

b) The activities do not require the continued use of vehicles. There will be scheduled maintenance of the sprinkler system however, it will not involve enough vehicle traffic generated to individually or cumulatively exceed a level of service standard established by the County for designated roads or highways. **Therefore, this impact would be less than significant and no further analysis is determined necessary.**

c) The proposed Project does not require the transport of materials to or from the proposed Project area via air traffic nor propose any structures that would result in a change in air traffic patterns. **No impacts are expected to occur and no further analysis is determined necessary.**

d) The proposed Project would not result in additional access points and revised circulation routes within the proposed Project area that could introduce new movements to travelers within and adjacent to the area. **No impacts are expected to occur and no further analysis is determined necessary.**

e) and f) Operation of the proposed Project would have no effect on the implementation of any emergency access or result in inadequate parking capacity. **No impacts are expected to occur and no further analysis is determined necessary.**

	Potentially Significant Impact	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
XVII. UTILITIES AND SERVICE SYSTEMS: Would the Project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒

d) Have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
e) Result in a determination by the wastewater treatment provider that serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?	☐	☐	☐	☒
g) Comply with Federal, State, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

Discussion:

a) Treated groundwater will be discharged via a sprinkler system to adjacent vacant land owned by KMEP. The anticipated rate of wastewater generation is one gpm which is relatively low and able to be absorbed within the existing capacity. **No impacts are expected to occur and no further analysis is determined necessary.**

b) The anticipated rate of wastewater generation is 1 gpm which is relatively low and able to be absorbed within the existing capacity. This amount will not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities. **No impacts are expected to occur and no further analysis is determined necessary.**

c) The proposed Project will not result in the construction of additional paved surface that may contribute to storm water during rain events. The treated groundwater will be discharged via a sprinkler system to the adjacent vacant land owned by KMEP and not discharged into the storm water system**. No impacts are expected to occur and no further analysis is determined necessary.**

d) The proposed Project will not require any quantity of potable water. The only water on site will be the treated extracted groundwater. **No impacts are expected to occur and no further analysis is determined necessary.**

e) As stated above, the anticipated rate of wastewater generation is one gpm which is relatively low and able to be absorbed within the existing capacity. This amount will not require or result in the construction of new water or wastewater treatment facilities nor impede the existing facilities. **No impacts are expected to occur and no further analysis is determined necessary.**

f) The proposed Project will not result in the generation of waste that would require disposal at a landfill. **No impacts are expected to occur and no further analysis is determined necessary.**

g) No solid waste will be produced on the proposed Project area. **No impacts are expected to occur and no further analysis is determined necessary.**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endanger plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b) Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☐	☒
c) Does the Project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

Discussion:

a) Based on the above checklist discussion, the proposed Project would occur in the City of Imperial on a previously disturbed vacant lot in an area that is highly developed and largely devoid of biological and cultural resources. The proposed Project will not result in the loss of open space habitat and associated wildlife; will not threaten a plant or animal community; will not reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. **Therefore, no impacts are expected and no further analysis is required.**

b) The potential for cumulative impacts occurs when the independent impacts of a project are combined with the impacts of related projects in proximity to the project and which, when combined with the project, result in impacts that are greater than the impacts of the project alone. Other current and/or probable future projects, whose development in conjunction with that of the proposed Project may contribute to potential significant cumulative impacts, are not located within the proposed Project area. Therefore, there is no potential for cumulative impacts related to any of the above environmental issues, resulting from the proposed Project in conjunction with related projects to occur. **No impacts are expected to occur and no further analysis is determined necessary.**

c) The proposed Project involves treated water discharged to vacant land via the operation of a sprinkler system. Due to the nature of the proposed Project, it will not cause substantial adverse effects on human beings, either directly or indirectly. **Therefore, no impacts are expected and no further analysis is determined necessary.**

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